

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

SHEINA LEVIN,

Defendant.

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: SUPERSSEDING INFORMATION  
:  
: S2 21 Cr. 221 (SHS)  
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COUNT ONE

(Conspiracy to Commit Honest Services Fraud)

The United States Attorney charges:

1. At all times relevant to this Information, SHEINA LEVIN, the defendant, owned and operated a real-estate business ("Company-1") that, among other things, leased property to a non-profit housing and social services organization ("Organization-1") that used public funds to operate soup kitchens, homeless shelters, and affordable-housing facilities in New York City.

2. From at least in or about May 2019 until at least in or about January 2021, SHEINA LEVIN, the defendant, agreed to and did engage in a scheme to pay bribes and kickbacks to Organization-1's President and CEO, Victor Rivera, in exchange for Rivera's awarding of subleases with Organization-1 to Company-1.

Statutory Allegations

3. From at least in or about May 2019 until at least in or about January 2021, in the Southern District of New York and elsewhere, SHEINA LEVIN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1343 and 1346.

4. It was a part and an object of the conspiracy that SHEINA LEVIN, the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and to deprive Organization-1 of its intangible right to the honest services of its President and CEO, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Sections 1343 and 1346, to wit, LEVIN and her co-conspirators, including Victor Rivera, devised and executed a scheme in which Rivera directed business related to Organization-1 to Company-1 in exchange for bribes and kickbacks, and transmitted or caused to be transmitted interstate wires in furtherance of that scheme.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Information, SHEINA LEVIN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

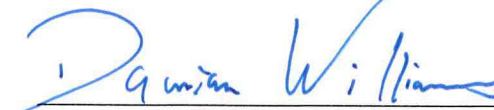
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
DAMIAN WILLIAMS *17R17ma*  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SUPERSEDING INFORMATION

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(18 U.S.C. § 1349.)

DAMIAN WILLIAMS  
United States Attorney

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